

**EXHIBIT A**

**PROPOSED ORDER**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
Old Carco LLC, <i>et al.</i> ,	:	Case No. 09-50002 (SMB)
	:	
Debtors.	:	Jointly Administered
	:	
	:	

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**ORDER GRANTING FRANKIE OVERTON’S MOTION  
FOR RELIEF FROM COURT’S “ENFORCEMENT ORDER” TO PERMIT HER  
TO PURSUE AN INDEPENDENT CLAIM AGAINST FCA US LLC**

Upon the motion (the “**Motion**”)<sup>4</sup> for entry of an order granting Overton relief from this Court’s *Order Granting in Part and Denying in Part FCA US LLC’s Motion to Enforce the Sale Order* [Docket No. 8535] (the “**Enforcement Order**”) to permit her to pursue an independent claim against FCA US LLC (“**FCA**”); and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference*, M-431, dated January 31, 2012 (Preska, C.J.); and this Court having the power to enter a final order consistent with Article III of the United States Constitution; and venue being proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and due and sufficient notice of the Motion having been provided; and the Court having considered the Motion and after due deliberation thereon; and good and sufficient cause appearing thereof; it is hereby

**ORDERED, ADJUDGED, AND DECREED that:**

1. The Motion is GRANTED as set forth herein.

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<sup>4</sup> Capitalized terms used but not otherwise defined herein shall have the meanings assigned to them in the Motion.

2. The Enforcement Order is hereby clarified, modified and/or amended to permit Overton to assert and prosecute a claim against FCA under the Alabama Wrongful Death Act based solely on FCA's post-Closing conduct, either in the action captioned *Overton v. Chrysler Group LLC*, Case No. CV 17-904376-EAF, pending in the Circuit Court of Jefferson County, Alabama or otherwise.

3. Except as set forth herein, the terms and provisions of the Enforcement Order remain unaltered and in full force and effect.

4. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: New York, New York  
\_\_\_\_\_, 2020

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HONORABLE STUART M. BERNSTEIN  
UNITED STATES BANKRUPTCY JUDGE